

IN THE UNITED STATES BANKRUPTCY COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI

IN RE: PHILLIP T. MAXWELL *aka* PHILLIP TODD MAXWELL

*fdb*a THISTLEDOME HONEYSUCKLE SOCIETY and

JILL C. MAXWELL *aka* JILL COLLINS MAXWELL

*fdb*a THISTLEDOME HONEYSUCKLE SOCIETY

DEBTOR(S)

CASE NO. 16-12068-JDW

CHAPTER 13

CREDITOR

FORD MOTOR CREDIT COMPANY LLC

**MOTION FOR ADEQUATE PROTECTION**

COMES NOW Ford Motor Credit Company LLC (FMCC), by counsel, and moves the Court to order adequate protection payments as follows:

1. FMCC holds a secured claim covering a 2012 Ford F150 vehicle bearing VIN 1FTFW1CF8CFA99277.
2. Pursuant to 11 U. S. C. § 1326(a)(1)(C), Debtor(s) is to pay adequate protection payments to FMCC beginning no later than thirty (30) days after the order for relief. Debtor(s) has not paid and FMCC has not received adequate protection payments. Debtor(s) should be required to pay adequate protection payments to FMCC.

WHEREFORE, FMCC moves the Court to order adequate protection payments as aforesaid; and FMCC requests such other relief to which it may be entitled in the premises.

Respectfully submitted,

FORD MOTOR CREDIT COMPANY LLC

by: /s/Larry Spencer, Its Attorney

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POST OFFICE BOX 123  
JACKSON, MS 39205  
PHONE: 601-948-1547, MB #7730  
spencer@kingandspencer.net

**CERTIFICATE OF SERVICE**

I, Larry Spencer, Attorney for Ford Motor Credit Company LLC do hereby certify that I have this day caused to be served, via CM/ECF and/or United States Postal Service, a true and correct copy of the above and foregoing "Motion for Adequate Protection" to:

Robert H. Lomenick, Jr.  
Rlomenick@gmail.com  
ATTORNEY FOR DEBTOR(S)

Locke D. Barkley  
sbeasley@barkley13.com  
TRUSTEE

Henry G. Hobbs, Jr.  
USTPRegion05.JA.ECF@usdoj.gov  
U.S. TRUSTEE

SO CERTIFIED this the 4<sup>th</sup> day of August 2016.

/s/Larry Spencer

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